

# EXHIBIT A

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x

5 E. JEAN CARROLL,

6 Plaintiff,

7 -against-

8 DONALD J. TRUMP, in his personal capacity,  
9 Defendant.

10 - - - - -x

11  
12 \*\*\* CONFIDENTIAL \*\*\*

13  
14 Remote deposition of CAROL MARTIN, taken  
15 pursuant to Notice, was held via videoconference,  
16 commencing October 18, 2022, at 10:01 a.m., on the  
17 above date, before Amanda McCredo, a Court Reporter  
18 and Notary Public in the State of New York.  
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23  
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1 C. Martin - Confidential

2 MR. BIALE: Objection to form.

3 BY MR. SWIFT:

4 Q Are you able to answer that, Ms. Martin?

5 A We were friends and coworkers.

6 Q How would you characterize your  
7 relationship with Ms. Carroll today? And when I say  
8 "today," I mean over the last couple of years or so.

9 A Friends.

10 Q When you say "friends," do you see her on a  
11 regular basis?

12 A I don't -- regular basis, meaning?

13 Q Do you see her -- have you seen her over  
14 the last two years?

15 A Yes.

16 Q Do you know on how many occasions you've  
17 seen her over the last two years?

18 A Half a dozen. About six times.

19 Q Do you also -- over the last two years,  
20 have you also texted with her?

21 A Yes, I have.

22 Q And if you could give an approximation how  
23 often you text with Ms. Carroll over the last two  
24 years?

25 A How frequently? How often?

1 C. Martin - Confidential

2 Q Correct.

3 A Twice a month. Maybe more. Maybe more.  
4 I'm just estimating. We go in and out.

5 Q Understood.

6 I know with texting, talking on the phone  
7 is a bit outdated today.

8 But over the last couple of years, can you  
9 estimate how many times you've spoken on the phone  
10 with Ms. Carroll?

11 MS. CROWLEY: Objection to form.

12 "Last couple of years" is pretty vague. Do  
13 you want to give an actual timeframe?

14 MR. SWIFT: Okay.

15 BY MR. SWIFT:

16 Q 2020 to the present, January 2020 to the  
17 present.

18 A Difficult to say. It would have been  
19 COVID, so texting may have been more. Same answer.  
20 Maybe a few more. Six or eight times.

21 Q When you communicated with Ms. Carroll for  
22 the last couple of years, was this purely about  
23 personal-type issues or did you also speak about  
24 work issues?

25 MR. BIALE: Objection to form.